

1 **GEORGE M. RANALLI, ESQ.**  
Nevada Bar No. 5748  
2 **JASON ANDREW FOWLER, ESQ.**  
Nevada Bar No. 8071  
3 **VICKI DRISCOLL, ESQ.**  
Nevada Bar No. 3939  
4 **JAMES F. HOLTZ, ESQ.**  
Nevada Bar No. 8119  
5 **RANALLI ZANIEL FOWLER & MORAN, LLC**  
2400 W. Horizon Ridge Parkway  
Henderson, Nevada 89052  
6 [ranalliservice@ranallilawyers.com](mailto:ranalliservice@ranallilawyers.com)  
7 Attorneys for Defendant,  
WALGREEN CO.

8 **UNITED STATES DISTRICT COURT**

9 **FOR THE DISTRICT OF NEVADA**

10 JEREMY AYERS, )  
11 Plaintiff, ) Case No:  
12 vs. ) 2:20-cv-02142-KJD-DJA  
13 WALGREEN CO. d/b/a WALGREENS; )  
14 DOES I through X; and ROE )  
15 CORPORATIONS I through XX, )  
16 inclusive, )  
17 Defendants. )  
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**STIPULATION AND ORDER**  
**TO REMAND CASE TO STATE**  
**COURT**

17 IT IS HEREBY STIPULATED AND AGREED, by Plaintiff, JEREMY  
18 AYERS, and Defendant, WALGREEN CO., by and through their  
19 undersigned counsel that Plaintiff's claims in this action be  
20 remanded to the Clark County District Court of Nevada, Case No.:  
21 A-20-822987-C, as Plaintiff concedes that the matter in  
22 controversy does not exceed the sum of \$75,000, exclusive of

23 / / /

1 interest and costs, pursuant to 28 U.S.C. § 1332, and, thus,  
2 this Court lacks jurisdiction of this matter.  
3

4 Dated this 10th day of  
5 December, 2020

6 Dated this 10<sup>th</sup> day of  
7 December, 2020

8 **BENSON & BINGHAM**

9 */s/ Danielle J. Richardson*

10 **DANIELLE J. RICHARDSON, ESQ.**

11 Nevada Bar No. 14752  
12 11441 Allerton Park Drive,  
13 Ste. 100  
14 Las Vegas, Nevada 89135  
15 Attorney for Plaintiff

16 **RANALLI ZANIEL FOWLER & MORAN,  
17 LLC**

18 */s/ Vicki Driscoll*

19 **GEORGE M. RANALLI, ESQ.**

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26 Nevada Bar No. 8119  
27 Attorneys for Defendant,  
28 WALGREEN CO.

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## ORDER

BASED UPON THE STIPULATION OF THE PARTIES and good cause appearing therefore,

IT IS HEREBY ORDERED ADJUDGED AND DECREED that:

1. This Court lacks jurisdiction of this matter as Plaintiff concedes that the matter in controversy does not exceed the sum of \$75,000, exclusive of interest and costs, pursuant to 28 U.S.C. § 1332; and

2. Plaintiff's claims in this action are remanded to the  
Clark County District Court of Nevada, Case No.: A-20-822987-C.

DATED this 17th day of December, 2020.

Respectfully submitted by:  
**RANALLI ZANIEL FOWLER & MORAN, LLC**

/s/ Vicki Driscoll

GEORGE M. RANALLI, ESO.

Nevada Bar No. 5748

## JASON ANDREW FOWLER

Nevada Bar No. 8071

**VICKI DRISCOLL, ESQ.**

Nevada Bar No. 3939

**JAMES F. HOLTZ, ESQ**

Nevada Bar No. 8119

Attorneys for Defendants

WALGREEN CO.